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Attorneys for Plaintiff Christopher Baker

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

CHRISTOPHER BAKER,)	
)	CASE NO. 11-00528 ACK-KSC
Plaintiff,)	
vs.)	
)	
LOUIS KEALOHA, as an individual and)	
in his official capacity as Honolulu Chief)	INITIAL DISCLOSURES
of Police;)	
STATE OF HAWAII;)	
CITY AND COUNTY OF HONOLULU;)	
HONOLULU POLICE DEPARTMENT;)	
NEIL ABERCROMBIE, in his official)	
capacity as Hawaii Governor,)	
)	
Defendants.)	

INITIAL DISCLOSURES

COMES NOW the Plaintiff, Christopher Baker, by and through the undersigned counsel, pursuant to Rule 26 of the Federal Rules of Civil Procedure, and submits the following initial disclosures:

I. INDIVIDUALS WITH NON-PRIVILEGED PERSONAL KNOWLEDGE

Christopher Baker
(808) 722-6847
3308 Morrell Street
Honolulu, HI 96819

Dexter Carrasco
(808) 521-5800
550 Halekauwila Street
Honolulu, HI 96813

Mr. Carrasco is the owner of Process Servers Exclusive, LLC, with whom Mr. Baker contracted as a process server.

II. DOCUMENTS

Copies of documents that Mr. Baker has in his possession, custody, or control and may use to support his claims have been presented to the Defendants as attachments to Mr. Baker's First Request for Admissions. Those documents include:

Letter from Mr. Baker to Defendant Louis Kealoha dated July 25, 2010; and

Letter from Defendant Louis Kealoha to Mr. Baker dated September 16, 2010.

In addition, Mr. Baker is aware of two other documents in the possession, custody, or control of Defendants which he has requested. Those documents include:

Letter from an agent of the Honolulu Police Department directing Mr. Baker to apply for a permit in person; and

The application Mr. Baker completed in person at the Honolulu Police Department on August 30, 2011.

Finally, documents do exist pertaining to damages. Counsel is attempting to obtain those documents and will disclose those documents to Defendants as soon as they are available.

III. DAMAGES

Mr. Baker is unable to disclose a precise calculation of damages at present. As noted above, counsel is attempting to obtain documents that will assist counsel in determining the amount to which Mr. Baker is entitled for loss of employment/wages. However, Mr. Baker will be requesting an award of damages for the violation of his civil rights. Mr. Baker is also requesting costs, attorneys' fees, and statutory fees. The amount of those awards cannot be determined until judgment is rendered.

IV. INSURANCE

Mr. Baker has no known insurance agreements with any person or company which would render that person or company liable for any claims in this case.

Dated: Honolulu, Hawaii; November 22, 2011

/s/ KEVIN O'GRADY

Kevin O'Grady
Attorney for Plaintiff
Christopher Baker

/s/ Richard L. Holcomb

Richard L. Holcomb
Attorney for Plaintiff
Christopher Baker

/s/ ALAN BECK

ALAN BECK

Attorney for Plaintiff

Christopher Baker

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing, Plaintiff's Initial Disclosures, was served on the following at their last known addresses:

Served electronically through CM/ECF:

Kendall J. Moser Kendall.J.Moser@hawaii.gov, atg.crl.d.efiling@hawaii.gov,
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on 22 November 2011

BY

/s/ KEVIN O'GRADY
Kevin O'Grady
Attorney for Plaintiff
Christopher Baker